

**UNITED STATES DISTRICT COURT**  
WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America

vs.

(1) Brittney Alexis Tong  
(2) Christian Emmanuel Clemon Bell

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§  
§  
§  
§  
§

CRIMINAL COMPLAINT

CASE NUMBER: DR:22-M -01706(1,2)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **July 18, 2022** in **Val Verde** county, in the **WESTERN DISTRICT OF TEXAS** defendant(s) did, conspire with and other unnamed co-conspirators, to transport, or move or attempt to transport or move, certain persons, knowing or in reckless disregard of the fact that that such persons were aliens illegally present in the United States, a felony,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(v)(I)

I further state that I am a(n) **Border Patrol Agent** and that this complaint is based on the following facts: *"On July 18, 2022, defendants TONG, Brittney Alexis and BELL, Christian Emmanuel Clemon both United States Citizens were arrested near Del Rio, Texas, within the Western District of Texas, for conspiracy to transport three illegal aliens in furtherance into the United States. Border Patrol Agents conducted a consensual encounter on a vehicle parked near a gas station. Agents determined driver TONG and front passenger*

**Continued on the attached sheet and made a part of hereof.**



Sworn to before me and subscribed in my presence,

\_\_\_\_\_  
Signature of Complainant  
Melton, Lance T.  
Border Patrol Agent

07/22/2022

File Date

at DEL RIO, Texas

City and State

VICTOR ROBERTO GARCIA

UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

**WESTERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

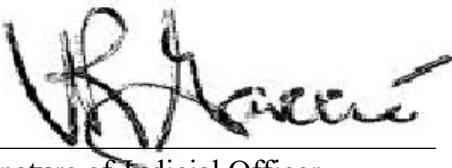
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**Continuation of Statement of Facts:**

BELL as United States Citizens, but passengers were foreign nationals who were illegally present in the United States. TONG and BELL both made admissions to their involvement in the failed smuggling event."



Signature of Judicial Officer



Signature of Complainant